

JUSTICE FIRST, LLP
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Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

WHEREAS, Defendant Ingrassia seeks to depose a witness, Richard Ha, prior to the mediation conference presently scheduled for January 11, 2008; and

WHEREAS, the defendant officer intends to be present during the deposition of Richard Ha; and

WHEREAS, Plaintiff and the deponent object to the defendant officer's presence during the deposition of this witness;

IT IS HEREBY STIPULATED AND AGREED between the parties and the undersigned attorneys that:

1. Plaintiff may file a motion for a protective order on an expedited basis, for
10:00
hearing before the court at ~~10:30~~am on December 7, 2007;

2. Plaintiff's motion must be filed no later than Wednesday, November 21, 2007;

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1 3. Defendant's opposition papers to Plaintiff's motion must be filed no later than
2 Wednesday, November 28, 2007.

3 4. Plaintiff's reply papers must be filed no later than Tuesday, December 4, 2007.

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5 DATED: November 20, 2007

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7 JUSTICE FIRST, LLP

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10 By: /s/ Jenny Huang
11 JENNY C. HUANG
12 Attorneys for Plaintiff
13 ABHINAV BHATNAGAR

14
15 DATED: November 20, 2007

16 MCNAMARA, DODGE, NEY, BEATTY,
17 SLATTERY, PFALZER, AND BORGES

18
19 By: /s/ James Fitzgerald
20 JAMES V. FITZGERALD, III
21 Attorney for Defendant
22 JASON INGRASSIA

23
24 DATED: November 20, 2007

25 SILVANO B. MARCHESI, County Counsel

26
27 By: /s/ Gregory Harvey
28 GREGORY C. HARVEY
29 Assistant County Counsel
30 Attorneys for Defendants
31 COUNTY OF CONTRA COSTA
32 and CITY OF SAN RAMON

33
34 Nov. 26, 2007

